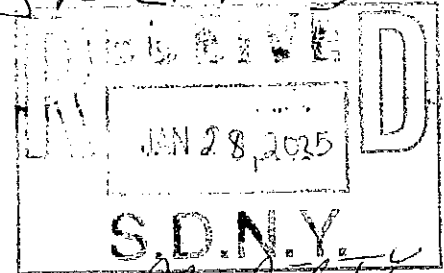


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
22 CR. 396 (PKC)

v.

BRIJESH GOEL,
Defendant.



MOTION FOR RETURN OF PROPERTY

The defendant, Brijesh Goel, prose,
respectfully moves this Court for
return of his passport, pursuant
to Rule 41(c) of the Federal Rules
of Criminal Procedure, for the reasons
set forth below:

1. At the time of his arrest in
this case, Federal Authorities seized
the defendant's passport.
2. The prosecution of the defendant
has ended in this case and the
government has no further use for

the defendant's passport.

3. The defendant's Federal prison term is set to expire in October of 2025, at which time he will be deported to India.

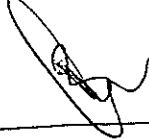
4. When the defendant is deported, authorities in India will not allow him to depart from the plane when it lands in India without a valid passport.

5. Pursuant to Rule 41(c), the defendant seeks an order from the court directing the government to return his passport in the care of the warden at the Federal Correctional Institution, Danbury, so that it will be immediately available to the defendant at the time of his anticipated deportation to India later this year. See *United States v. Seabrook*, 2021 U.S. Dist. LEXIS 47914 (S.D.N.Y., March 15, 2021) (granting motion

For return of property under Rule 41(c) where prosecution had ended AND government had no further use for items seized from defendant at the time of his arrest).

WHEREFORE, the instant motion should be granted AND an order should be issued directing the government to return the defendant's passport in the care of the warden at F.C.I. Danbury so that it will be immediately available to the defendant when his sentence expires AND he is deported to India.


Respectfully Submitted


 BRITESH GOEL, Pro Se
 Reg. No. 12600-510
 33 1/2 Pembroke Road
 Danbury, CT 06811

Dated: JANUARY 20, 2025

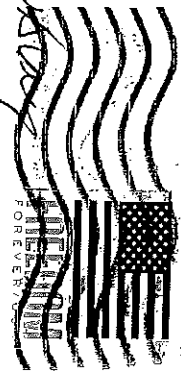
PROOF OF SERVICE

This is to certify that A
COPY OF the Foregoing Motion
For Return of Property has
been mailed to Samuel Rithschild,
AUSA, 1 St. Andrews Plaza,
NY, NY 10007, this 20th
day of JANUARY, 2025, VIA
FIRST CLASS MAIL.



Brizesh Goel

WESTCHESTER NY 105



22 JAN 2025 PM 4 L

Mr. Brijesh Patel
Reg. No. 12600-510
Federal Correctional Institute
33 1/2 Pembroke Road
Danbury CT 06811

Clerk, U.S. District
Southern District of
New York
500 Pearl Street
NY, NY 10007

10007-131608

